IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

IN RE:

Case No. 8:14-BK-13452
Chapter 7

THOMAS SALVADOR MARTINO,

Debtor.
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MOTION FOR EXTENSION OF TIME TO FILE COMPLAINT OBJECTING TO DEBTOR'S DISCHARGE OR THE DISCHARGEABILITY OF CERTAIN DEBTS

Savannah Capital, LLC ("Savannah"), a creditor and party in interest in this Chapter 7 bankruptcy case (the "Liquidation"), by and through its undersigned counsel, hereby files this motion (this "Motion") seeking an extension of time to file a complaint objecting to the discharge of Thomas Salvador Martino (the "Debtor") or to the dischargeability of certain debts, and states in support as follows.

1. Savannah is a creditor of the Debtor, pursuant to its business relationship with the Debtor in connection with their interests in DeVille Corp. ("DeVille"). The Debtor is the president of DeVille.

2. On November 14, 2014, the Debtor initiated this Liquidation by filing a voluntary petition for protection from creditors under Chapter 7 of the Bankruptcy Code, thereby initiating this Liquidation.

3. The 341 Meeting of Creditors was first held on December 17, 2014 and has been continued two (2) times. The next 341 Meeting of Creditors is scheduled for March 18, 2014.

4. The Trustee and Savannah have both sought examinations of the Debtor pursuant to Bankruptcy Rule of Procedure 2004.

5. Savannah is investigating matters that may impact the Debtors' discharge and/or the dischargeability of certain debts.

6. On February 10, 2015, the Trustee filed the "Motion for First Extension of Time to File Complaint Objecting to Debtor's Discharge or the Dischargeability of Certain Debts" [Doc. 26] (the "Trustee Motion").

7. The Trustee Motion seeks to extend the deadline under Bankruptcy Code §§ 727 and 523 for all creditors and parties in interest, however, the Court's "Order Granting Motion to Extend Time" (the "Extension Order") [Doc. 27] does not include reference to creditors or other parties in interest.

8. Savannah therefore requests entry of an order granting this Motion, and clarifying the Extension Order, to allow Savannah a sixty (60) day extension of the initial deadline to file a complaint under Bankruptcy Code §§ 727 and/or 523.

WHEREFORE, Savannah respectfully requests that this Court enter an order granting this Motion, clarifying the Extension Order, and extending the deadline for Savannah to file a complaint to object to dischargeability of a debt and/or a complaint to object to discharge sixty (60) days from the initial deadline.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic means on the 16th day of February, 2014 to the following:

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